



KAUFMAN BORGEEST & RYAN LLP

875 THIRD AVENUE, NEW YORK, NY 10022
TEL: 212.980.9600 FAX: 212.980.9291 WWW.KBRLAW.COM

May 22, 2025

WILLIAM DOHENY
DIRECT: 646.367.6684
WDOHENY@KBRLAW.COM

VIA ECF

Honorable Arun Subramanian
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

GRANTED. Plaintiff's opposition will be due July 28, 2025, and defendants' reply is due August 11, 2025. The Clerk of Court is respectfully directed to terminate the motion at ECF No. 111.

SO ORDERED.

A handwritten signature in blue ink, appearing to read 'Arun Subramanian'.

Arun Subramanian, U.S.D.J.

Date: May 23, 2025

Re: *Derick Williams v. Breaking Ground Housing Development Fund Corporation, et al.*
Civil Action No.: 1:22-cv-8715(AS)

Dear Judge Subramanian:

We represent Defendants Breaking Ground Housing Development Fund Corporation, et al, and write this letter to request an extension of time to file Defendants' motion for summary judgment until June 30, 2025. The original deadline for the motion is May 30, 2025. This is the first request for an extension of time to file the summary judgment motion. Defendants are requesting this extension because Karen Warner's health issues (Defendants first apprised the court of Ms. Warner's condition in Docket No. 94), which have worsened recently, render Ms. Warner unreachable for several weeks at a time. It is necessary for Counsel for Defendants to speak to Ms. Warner, a named Defendant, before filing their motion for summary judgment. Plaintiff does not consent to this extension. At first, Plaintiff did not consent in light of the previous requests for extension of discovery deadlines. Plaintiff then called Counsel for Defendants a second time and represented that he will file a letter with his reasons for not consenting.

This extension affects Plaintiff's time to respond to the summary judgment, the current deadline is June 30, 2025 and Defendants' time to file a reply to Plaintiff's opposition on July 14, 2025. Defendant's propose giving the Plaintiff 60 days to respond, until August 29, 2025 in light of his pro se status, and September 12, 2025 for Defendants' reply.

Thank you for your consideration.

Sincerely,

KAUFMAN BORGEEST & RYAN LLP,

A handwritten signature in blue ink, appearing to read 'William Borgeest'.

NEW YORK

NEW JERSEY

CONNECTICUT

CALIFORNIA

11223362

William Doheny

cc:

Derick L. Williams

2438 Morris Ave.

Apt. 4E

Bronx, NY 10468

646 260 8382